

Senior Community Service Employment Program Department of Administration – Program 3

I. PROGRAM OBJECTIVES

The Alaska Legislature created the Alaska Commission on Aging (ACoA) in 1981 to ensure dignity and independence for Alaska's elderly and assist them in maintaining meaningful, quality lives. As part of the Division of Senior Services, the ACoA plans, coordinates, and grants funds to provide community-based services to help seniors live as independently as possible. Services include meals, rides, residential care, adult day programs, respite care, care coordination, support to families of dementia clients, legal services, and a variety of other support services. The Division of Senior Services is the State Unit on Aging for the Older Americans Act. Alaska is a single planning and service area state.

A. Accounts Structure

ACoA administration is in the Division's Protection, Community Services, and Administration budget component. The ACoA oversees four grants programs in four other additional budget components:

- The Home and Community- Based Care (HCB) budget component includes grant funds supporting adult day services, respite care, care coordination, and Alzheimer's Disease education and family support. Funding sources include state general funds authorized under AS 47.65 and state general funds allocated from the Alaska Mental Health Trust Authority.
- The Senior Residential Services (SRS) budget component includes grant funds supporting senior residential services. Funding sources include designated state general funds authorized under AS 47.65.
- The Nutrition, Transportation and Support Services (NTS) budget component includes grant funds supporting senior nutrition, transportation, and supportive services. Funding sources include federal Title III B, C, D, and F of the Older Americans Act, U.S. Department of Agriculture cash reimbursement, required state general fund match, and state general funds authorized under AS 47.65.
- The Senior Community Service Employment program (SCSEP) budget component includes grant funds supporting the senior employment

programs. Funding sources include federal Title V, required state general fund match, and state general funds authorized under AS 47.65.

B. Program Organization

The ACoA grants separate awards for HCB, SRS, NTS, and SCSEP services. HCB grant awards for adult day services, respite care services, care coordination, and support for families of dementia clients require grantees to implement sliding fee schedules and when possible, bill third party insurance and other third party payer sources. SRS grant awards for senior residential services allow grantees to charge fees for services. In contrast, federal regulations govern NTS grants for meals, rides, and a variety of support services through Title III of the Older Americans Act, and prohibit the assessment of client fees, though allow for the solicitation of voluntary client contributions. The SCSEP is separate because it is a jobs program, rather than a service program such as NTS, HCB, and SRS although SCSEP participants often are placed in the services programs. Separate HCB and SRS grant awards also assure that Alaska Mental Health Trust Authority (MHTA) funds are allocated and tracked. In addition, HCB and SRS services are ACoA's more intensive, higher cost-per-client services.

II. PROGRAM PROCEDURES

See Section III, below.

III. COMPLIANCE REQUIREMENTS AND SUGGESTED AUDIT PROCEDURES

PROGRAM ADMINISTRATION

The SCSEP is authorized under Title V of the Older Americans Act (OAA) of 1965, as amended. The United States Department of Labor's Employment and Training Administration administer the program. (20 CFR Part 641) The SCSEP provides and promotes useful, part-time job and training opportunities in community service activities for low-income persons who are 55 years of age and older and, assists and promotes the transition of program participants to unsubsidized employment.

A. TYPES OF SERVICES ALLOWED OR UNALLOWED

Compliance Requirement

The Alaska Commission on Aging is responsible for following and enforcing the requirements set forth in the OAA and implementing and carrying out projects in accordance with the provisions of the grant agreement. (20 CFR 641.302(a)(1)(2)(3)(b)(c)(d))

The ACoA must assure that the project will serve the needs of minority, limited English-speaking, and Indian eligible individuals as well as eligible individuals who have the greatest economic need, at least in proportion to their numbers in the State. The SCSEP shall take into consideration their rates of poverty and unemployment based on the best available information.

The ACoA periodically shall monitor the performance of grant-supported activities to assure that project goals are being achieved and that the requirements of the OAA and USDOL are being met.

The ACoA shall obtain and record the personal information necessary for a proper determination of eligibility for each individual and maintain documentation supporting the eligibility of enrollees.

The ACoA shall make efforts to provide equitable services among substantial segments of the population; including outreach to broaden the composition to include members of both sexes, various race/ethnic groups and individuals with disabilities. (20 CFR 641.302)

Suggested Audit Procedures

- There are no special suggested audit procedures.

B. ELIGIBILITY

Compliance Requirements

All eligible individuals must be 55 years of age or older whose income is not more than 125% of the poverty guidelines established by the Bureau of Labor Statistics. Individuals who are 60 years of age or older shall have priority for the work opportunities provided for under this title. A disabled person may be treated as a "family of one" for income eligibility purposes. (20 CFR 641.305)

As set forth in sections 502(b)(1)(M) and 507(1) of the OAA, enrollment priorities for filling all positions shall be according to 20 CFR 641.306(a)(b).

The (SCSEP) or their sub-grantees are responsible for certifying eligibility prior to participation in community service assignment. Re-certification must be completed once a year. (20 CFR 641.305)

The ACoA staff shall review each Intake Application and make the final determination of program eligibility. When a participant has been incorrectly determined eligible, the Commission will notify the grantee and instruct the grantee to give the individual a 30-day notice of termination.

Suggested Audit Procedures

- Verify that the (SCSEP) sub-grantee has documented client age and income and determined eligibility prior to participating in community service assignments.
- Verify that the hardest to serve clients and those over 60 are being given priority for community service assignments.
- Verify that re-certification is completed annually.

ALLOWABLE SERVICES

Compliance Requirements

The SCSEP or sub-grantee shall provide orientation to eligible individuals who are enrolled as soon as practical after determination of eligibility according to 20 CFR 641.308.

The SCSEP or sub-grantee shall assess each enrollee under the grant according to 20 CFR 641.309(a)(b).

The SCSEP or sub-grantee shall use the assessment or reassessment for developing an individual development plan (IDP) according to 20 CFR 641.309(e). The IDP must be reviewed at least once in a 12-month period.

Participants shall be employed in projects or at agencies that provide community services. (20 CFR 641.101) Participants may not be employed in projects involving the construction, operation, or maintenance of any facility used as a place for sectarian religious instruction or worship, and participants may not be assigned work involving construction of highways or work which inures primarily to the benefit of private, profit making organizations.

SCSEP enrollee's community service assignment shall not exceed 1,300 hours during a 12-month period. The 1,300 hours includes paid hours of orientation, training, sick leave, and vacation and hours of enrollment

provided by all grantees and sub-grantees. The enrollee shall not be required to participate more than 20 hours during one week; however hours may be extended with the consent of the enrollee. (20 CFR 641.310 (b)(3)).

Funds may be awarded for fewer than 20 hours per week. The reduced hours shall be agreed to by the sub-grantee and the enrollee. (20 CFR 641.310(b)(3))

The SCSEP shall ensure that enrollees receive wages at the highest applicable rate according to 20 CFR 641.311(a)(1)(2)(3) and fringe benefits according to 20 CFR 641.311(b). Enrollee wages and fringe benefits are paid for community service assignments including orientation and training in preparation for community service assignments. (20 CFR 641.311(a))

The SCSEP or sub-grantee shall provide or arrange for training specific to an enrollee's community service assignment.

The SCSEP shall provide supportive services designed to assist the enrollee in participating in community service assignments and preparing and assisting the enrollee in obtaining unsubsidized employment according to 20 CFR 641.312 (b)(1)(2)(3)(4)(5).

The SCSEP shall ensure that enrollees are offered annual physical examinations. An enrollee may refuse the physical examination through a signed waiver. (20 CFR 641.311(b)(3))

Suggested Audit Procedures

- Determine that SCSEP positions are approved in the most recent grant agreement or Notification of Grant Award (NGA) adjustment (position, job title, hourly wage, and fringe benefits, and number of hours approved to work). (Review current grant award.)
- Determine that the host agency is a community service agency as defined in 20 CFR 641.102.
- Review grantee's procedures for limiting SCSEP participants to working the maximum and minimum hours.
- Check to assure that participant salaries from payroll records are the same as those approved in the grant agreement.
- Verify that host agencies provide SCSEP orientation to all participants to assure participants' understanding of the purpose of the SCSEP (20 CFR Section 641.308)

- Verify that the physical examination has been offered and verification of the exam or refusal is documented.
- Verify that an assessment has been completed for each enrollee.

C. MATCHING, LEVEL OF EFFORT, AND/OR EARMARKING REQUIREMENTS

Compliance Requirements

Generally, the project sponsor must pay for at least 10% of the total cost of the project with cash or an in-kind contribution.

The Commission uses General Funds to match 10% of the total project cost.

Suggested Audit Procedures

- There are no special suggested audit procedures.

The ACoA staff monitors for match. No audit procedures are required relating to ACoA grantees.

Funds are awarded through grants to public or private nonprofit organizations, or divisions of state, federal or local government, or Native tribal organizations, to provide community service assignments for older workers who meet the eligibility requirements for the Title V SCSEP as defined in 20 CFR 641.305.

D. REPORTING REQUIREMENTS

Compliance Requirement

Costs associated with participant work must be accounted for separately from other grantee programs.

Suggested Audit Procedures

- Verify that grantee and sub-grantee accounting systems have cost codes for the SCSEP separate from other grant programs.
- Verify that all expenditures associated with SCSEP participants are recorded and current.
- Verify that SCSEP participants are paid in a timely manner.
- Verify that there are two valid signatures (participant and participant's supervisor) on each time sheet.

E. SPECIAL TESTS AND PROVISIONS

Compliance Requirement

The SCSEP enrollees must not displace current employees, nor impair existing contracts for services. (OAA Title V Sec. 501 (b) (1) (F) (I) (G))

The SCSEP enrollees shall not be permitted to work in a building or surroundings or under conditions that are unsanitary, hazardous, or dangerous to the enrollees' health or safety. (20 CFR 641.310(d))

Suggested Audit Procedures

- Test payroll and personnel records to ascertain whether SCSEP participants were used to supplant work that would otherwise be performed.
- Check grantee plan for participant supervision at the work site.
- Verify that the work area has been inspected by appropriate safety licensing/certifying agencies.

Compliance Requirement

SCSEP wages must be the higher of either the federal or state minimum wage, or the prevailing rate of pay for persons employed in similar public employment.

Suggested Audit Procedures

- Identify which positions SCSEP employees fill.
- Ascertain federal and state minimum wage or agency's prevailing pay scale for filled positions.

OLDER WORKER SPECIALIST PROGRAM

According to 20 CFR, Section 641.312 (b)(1,2,3), SCSEP or their sub-grantees shall provide supportive services designed to assist the enrollee in participating successfully in community service assignment and, where appropriate in obtaining unsubsidized employment. The ACoA has awarded sub-grants to agencies to provide these services in Anchorage, Mat-Su Valley, Fairbanks, and Juneau. The employee who provides the services is called an Older Worker Specialist.

The programs may be totally or partially funded with Title V funds to provide the services to SCSEP eligible individuals. These services may include, but are not limited to the following activities:

- Recruitment and selection of eligible enrollees.
- Assessment of enrollees for participation in community service assignments and evaluation of enrollees for continued participation or transition to unsubsidized employment.

- Development of appropriate community service assignments.
- Development of unsubsidized employment opportunities for enrollees.
- Counseling or instruction to assist the enrollee to participate successfully in community service assignment or to obtain unsubsidized employment.
- Counseling designed to assist the enrollee personally in areas such as health, nutrition, social security benefits, Medicare benefits, and retirement laws.
- Periodic meetings on topics of general interests, including matters related to health, job seeking skills, safety, and consumer affairs.

With the implementation of the Workforce Investment Act, the Older Worker Specialist will provide services in the Alaska One-Stop Centers.

Compliance Requirements

Monthly financial reports are submitted on the same schedule as other Title V funded programs. Budgets for these programs may include personnel costs and administrative costs. Accounting records must be supported by such source documentation as canceled checks, paid bills, payroll records, time and attendance records, contract and sub-grant award. Source documentation for administrative costs must be retained at the grantee agency and are not required to be submitted along with financial reports.

Suggested Audit Procedures

- Verify that the Older Worker Specialist's time is spent with SCSEP enrollees and that time spent with non-Title V individuals is paid for from other sources.
- Verify that the Older Worker Specialist's services are provided in the One-Stop Centers.

IMPLEMENTATION OF WORKFORCE INVESTMENT ACT

Compliance Requirements

The United States Department of Labor's Employment and Training Administration has regulations for the Workforce Investment Act; Interim Final Rule. (20 CFR Part 652, et.al.)

The SCSEP is a mandated partner under this act. As a mandated partner, the SCSEP will address issues and coordinate services with workforce development partners including entering Memorandum of Understandings, developing working agreements, and providing services in the Alaska One-Stop Centers. The SCSEP will actively work on committees and boards to

develop procedures for providing seamless services to potential SCSEP enrollees.

Suggested Audit Procedures

- Verify that the SCSEP staff is participating in plan development both statewide and on local levels.
- Verify that the SCSEP staff has made efforts to ensure that the program is represented on the local workforce investment boards (LWIB) and local One-Stop Center Advisory Boards.

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